

**Before the Federal Communications Commission**

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*IN RE*

TRANSITION FROM TTY TO REAL-TIME TEXT TECHNOLOGY  
&  
PETITION FOR RULEMAKING  
TO UPDATE THE COMMISSION'S RULES FOR ACCESS  
TO SUPPORT THE TRANSITION  
FROM TTY TO REAL-TIME TEXT TECHNOLOGY,  
AND PETITION FOR WAIVER  
OF RULES REQUIRING SUPPORT OF TTY TECHNOLOGY

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*ON NOTICE OF PROPOSED RULEMAKING*

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**REPLY COMMENTS OF THE  
NATIONAL EMERGENCY NUMBER  
ASSOCIATION**

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# Before the Federal Communications Commission

CG Docket No 16-145 – GN Docket No 15-178

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*IN RE*

TRANSITION FROM TTY TO REAL-TIME TEXT TECHNOLOGY  
&  
PETITION FOR RULEMAKING  
TO UPDATE THE COMMISSION'S RULES FOR ACCESS  
TO SUPPORT THE TRANSITION  
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## REPLY COMMENTS OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION

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NENA: The 9-1-1 Association respectfully submits the following Reply to comments submitted in response to the *Notice of Proposed Rulemaking* adopted by the Commission on April 28<sup>th</sup>, 2016, in the above-captioned proceeding.

### COMMENTS

NENA is pleased that carriers, handset manufacturers, consumer accessibility advocates, emergency service associations, and public-sector agencies agree that *now* is the time to begin the transition from TTY to RTT. The importance of the near-universal recognition of the potential benefits of this transition cannot be overstated.

**I. A phased transition, with a clear end-date, may be preferable to a single date-certain.**

As the time is right and there are enormous benefits to be gained from the move to TTY, the Commission should require that carriers implement and test RTT as soon as possible. However, NENA generally agrees with the Texas 9-1-1 Entities position that there is a need for public testing of RTT at PSAPS before full deployment.<sup>1</sup> Because many Public Safety Answering Points (PSAPs) may not be able to accept native RTT in the very short term, TTY-RTT compatibility and inter-carrier RTT interoperability are must be tested before a nation-wide roll-out can proceed.

NENA hopes to have full implementation of RTT as soon as possible, and fully shares the enthusiasm of commenters who want a date-certain for that goal.<sup>2</sup> However, because of the potential for technical and operational difficulties with such a large rollout, NENA cautiously agrees with other commenters that a phased transition may be preferable.<sup>3</sup> NENA previously stated that care must be taken to protect 9-1-1 service and consumers during the switch from TTY to RTT.<sup>4</sup> Because immediate, error-free adoption of RTT is unlikely, it is vitally important that RTT and TTY interoperate while users and 9-1-1 services switch over to full end-to-end RTT. However, much like Texas 9-1-1 Entities<sup>5</sup> and West Safety

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<sup>1</sup> Texas 9-1-1 Entities, *Comments* at 2 (GN Docket 15-178, CG Docket 16-145).

<sup>2</sup> Consumer Group, *Comments* at 5-6 (GN Docket 15-178, CG Docket 16-145); RERC, *Comments* at 10 (GN Docket 15-178, CG Docket 16-145).

<sup>3</sup> Verizon, *Comments* at 4 (GN Docket 15-178, CG 16-145); CTIA, *Comments* at 15 (GN 15-178, CG 16-145).

<sup>4</sup> NENA: The 9-1-1 Association, *Comments* at 8-9 (GN Docket 15-178, CG Docket 16-145).

<sup>5</sup> *Id.* at 3-5.



Services,<sup>6</sup> NENA recognizes that there exist legitimate interoperability concerns related to a mixed RTT-TTY environment (e.g. character and symbol differences between TTY and RTT). Interoperability problems could decrease the effectiveness of RTT in the short term, and hamper the overall ability of 9-1-1 to fully leverage this new technology. Recognizing these interoperability concerns, NENA supports the addition of §67.2 proposed by Texas 9-1-1 Entities.<sup>7</sup> At the very latest, NENA proposes that the TTY sunset should be in 2020. As recognized by the Commission,<sup>8</sup> that date is consistent with the E9-1-1 sunset date supported by many 9-1-1 stakeholder groups. A 2020 sunset date would allow 9-1-1 centers to better integrate the technology and ensure proper consumer safety standards are met. We wish to emphasize, however, our view that a phased roll-out should not excuse any unjustified delay. NENA is convinced that this technology can, and should, be successfully deployed in the short term.

## **II. All handsets first manufactured or offered for sale after the TTY sunset date should support RTT.**

Concerning handsets, NENA emphasizes that all CMRS handset manufacturers and OS developers should work to implement RTT technology. Thus, NENA agrees with other commenters that handsets need not require both RTT and TTY support within the same device;<sup>9</sup> having

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<sup>6</sup> West Safety Services, Inc., *Comments* at 4-5 (GN Docket 15-178, CG Docket 16-145).

<sup>7</sup> Texas 9-1-1 Entities, *Comments* at 5 (GN Docket 15-178, CG Docket 16-145).

<sup>8</sup> *NPRM* at ¶ 66

<sup>9</sup> Consumer Technology Association, *Comments* at 3 (GN Docket 15-178, CG Docket 16-145); CTIA, *Comments* at 7 (GN Docket 15-178, CG Docket 16-145).

RTT technology as soon as is achievable would be sufficient. However, NENA disagrees with other commenters who argue that wireless feature phones manufactured after the TTY sunset date should be exempt from RTT requirements.<sup>10</sup> The record reflects that RTT can be integrated into feature phone designs, and NENA believes it is too important to be omitted.

### **III. NG9-1-1 can accommodate simultaneous and n-way media sessions, and block messaging**

RTT is a core feature of NG9-1-1, and creates lifesaving benefits in the 9-1-1 field. Comments filed in this docket reflect a strong consensus around the need to quickly transition from TTY to RTT. Most recognize the enhanced capabilities that RTT will bring to the public safety community, as well as its considerable impact on the consumer experience. However, a few commenters seek exceptions for certain types of telecommunications services.<sup>11</sup> NENA takes no position with respect to whether the Commission's rules should include any such exceptions. We simply note that Version 2.0 of the i3 Standard will accommodate simultaneous RTT, voice, and/or video, with a wide range of third-party involvement.<sup>12</sup> This means that NG9-1-1 systems and PSAPs

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<sup>10</sup> Consumer Technology Association, *Comments* at 3 (GN Docket 15-145, CG Docket 16-145).

<sup>11</sup> Sorenson Communications, *Comments* at 6 (GN Docket 15-178, CG Docket 16-145) (Asking for exceptions from implementing RTT on VRS or IP CTS); TracFone, *Comments* at 6-7 (GN Docket 15-178, CG Docket 16-145) (stating that RTT rules should not apply to non-interconnected VOIP).

<sup>12</sup> Version 2.0 is currently in "Stable Form," but has not yet been finally approved and published. Changes could be made prior to publication. For example, significant intellectual property licensing issues could arise during review, or process errors could be discovered. NENA views both possibilities as unlikely, due to the stringent requirements for IPR disclosure and process conformance used during development. The current status

should be able to accommodate a mix of media profiles offered by application, relay, and carrier providers, whether transitional or permanent. Other comments discussed whether RTT must be character-by-character or if block messaging should be allowed as well.<sup>13</sup> Block messaging could help PSAP operators give delicate instructions that might be misconstrued, were the message read character-by-character. The i3 standard thus supports RFC 4103 and MSRP block messaging. If implemented however, NENA believes there must be some signal to let an end user know a block message is being written. Otherwise, due to the time required to compose a block message, there would be larger periods of apparent inactivity than there has been with traditional TTY. In such cases, the end user must be made aware that the channel silence does not mean that they were disconnected, or that there was a communication issue on the channel.

#### **IV. In determining reseller obligations, the Commission should focus on functional distinctions.**

In regard to wireless carrier resellers, NENA reiterates our stance that application of RTT rules depends on which type of service the provider is reselling. If a reseller is utilizing both the access network and the originating service facilities of the underlying carrier, then NENA agrees with other commenters that the reseller should only be required to offer RTT when the underlying provider supports this functionality.<sup>14</sup> However, in cases where a wireless reseller uses only the access network of

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of the revision can be viewed by registered users at [dev.nena.org](http://dev.nena.org).

<sup>13</sup> West Safety Services, Inc., *Comments* at 6 (GN Docket 15-178, CG Docket 16-145); See Telecommunications Industry Association, *Comments* at 10 (GN Docket 15-178, CG 16-145).

<sup>14</sup> TracFone, *Comments* at 2-3 (GN Docket 15-178, CG Docket 16-145).

the underlying carrier, NENA urges the Commission to require the reseller to implement RTT on its own. This conceptual separation between the access network function and the originating service function is fair to all parties, and consistent with the level of control each exerts over the relevant inputs.

**V. The Commission should prohibit the imposition of third-party transition costs on PSAPs.**

There will be costs associated with any transition from older to new technology, especially in something as important as the 9-1-1 field. Many commenters highlighted the need for the Commission to ensure that no costs of the transition fall on the PSAPs themselves.<sup>15</sup> NENA generally agrees with these comments. Many PSAPs are already financially strapped, and it is in the best interest of public safety to ensure that they continue to run with as little additional financial obligation as possible during this transition. However, NENA also recognizes that any transition this size will incur training and organizational costs. In order to ensure that PSAPs can preserve funding for the training required to accommodate this change, we therefore urge the Commission to minimize the burden on PSAPs by ensuring that third parties cannot force any *external* costs on PSAPs.

**VI. The Commission should resolve questions about wireline obligations with regard to RTT.**

Finally, many commenters have taken varied positions on whether wireline providers should be required to participate in the TTY to RTT transition. The National Cable and Telecommunications Association, for example notes

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<sup>15</sup> National Association of State 911 Administrators, *Comments* at 2, (Gn Docket 15-178, CG Docket 16-145); APCO International, *Comments* at 2 (GN Docket 15-178, CG Docket 16-145).

that some currently-deployed network technology is inconsistent with the technological and operational requirements of RTT.<sup>16</sup> Other commenters noted that wireline carriers have less knowledge of, and have been less involved with, the standard-setting process.<sup>17</sup> However, concerns have also been raised that *not* applying RTT technology to wireline services would “undermine the clearly stated congressional objectives of functional equivalence and access to advanced communications services”.<sup>18</sup> As noted in NENA’s previous comments, this issue is bound-up with the broader IP transition. We again urge the Commission to quickly and conclusively resolve questions about whether originating service obligations will vary based on the category of underlying access network technology, or not.<sup>19</sup>

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<sup>16</sup> National Cable and Telecommunications Association, *Comments* at 5-6 (GN Docket 15-178, CG Docket 16-145).

<sup>17</sup> American Cable Association, *Comments* at 4 (GN Docket 15-178, CG Docket 16-145).

<sup>18</sup> VTCSecure, *Comments* at 1.

<sup>19</sup> See generally NENA: The 9-1-1 Association, *Comments* (GN Docket 13-5, WC Docket 05-25).

## CONCLUSION

The benefits of RTT on the 9-1-1 field can be tremendous if implemented correctly. For this reason, we urge the Commission to adopt final rules consistent with the Notice and with NENA's comments. We look forward to a quick RTT transition, and improving local 9-1-1 centers' ability to serve their populations.<sup>†</sup>

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<sup>†</sup> NENA wishes to acknowledge the contributions of our law clerk, Alex Kimata, in this proceeding. A rising-2L at the University of Colorado Boulder, Alex prepared the initial draft of this filing.